

**IN THE UNITED STATES DISTRICT COURT FOR THE  
WESTERN DISTRICT OF MISSOURI  
SOUTHWESTERN DIVISION**

LANE ALLMOND and MISTY	)	
ALLMOND,	)	
	)	
Plaintiffs,	)	
	)	
vs.	)	Case No.: 19-CV-05058-RK
	)	
DOREL JUVENILE GROUP, INC.,	)	
	)	
Defendant.	)	

**JOINT MOTION FOR ORDER EXTENDING EXPERT DEADLINES**

Plaintiffs LANE ALLMOND and MISTY ALLMOND and Defendant DOREL JUVENILE GROUP, INC. (the “Parties”) jointly move the Court for short extensions to the deadlines for expert designations and depositions for the following reasons:

1. This is a complex product liability action which involves extensive discovery and will have multiple expert witnesses on both sides.
2. Throughout the COVID-19 coronavirus pandemic, discovery has been proceeding efficiently in this matter. However, the pandemic has made travel challenging for plaintiffs’ experts as they would be traveling from both the east and west coasts to Missouri.
3. Federal Rule of Civil Procedure 16(b)(4) provides: “A schedule may be modified only for good cause and with the judge’s consent.” *See* Fed. R. Civ. P. 16(b)(4).
4. On July 22, 2020, at the Parties’ joint request, the Court entered a Second Amended Scheduling and Trial Order (ECF No. 73) that set the following expert deadlines:
  - a. Plaintiffs’ Expert Designation: 60 days before discovery deadline (2/5/2021);
  - b. Deadline to Produce Plaintiffs’ Expert for Deposition: 4 weeks after expert is designated (3/5/2021);

- c. Defendant's Expert Designation: 45 days after Plaintiff Expert deadline (3/19/2021);
- d. Deadline to Produce Defendant's Expert for Deposition: 4 weeks after expert is designated (4/16/2021);
- e. Rebuttal Expert Designation: 30 days before discovery deadline (4/30/2021); and
- f. Deadline to Produce Rebuttal Expert: 2 weeks after expert is designated (5/21/2021);

5. The Parties jointly request short extensions of the expert deadlines, as follows:

<b>Event</b>	<b>Current Deadline</b>	<b>Proposed New Deadline</b>
Plaintiffs' Expert Designation	2/5/2021	<b>2/26/2021</b>
Deadline to Produce Plaintiffs' Expert for Deposition	3/5/2021	<b>3/19/2021</b>
Defendant's Expert Designation	3/19/2021	<b>4/9/2021</b>
Deadline to Produce Defendant's Expert for Deposition	4/16/2021	<b>5/7/2021</b>
Rebuttal Expert Designation	4/30/2021	<b>5/14/2021</b>
Deadline to Produce Rebuttal Expert	5/21/2021	<b>5/28/2021</b>

6. The requested extensions of expert deadlines will not have any impact on any other deadlines in the case, including the discovery deadline (5/28/2021), the dispositive motion deadline (7/2/2021), or the trial date (10/4/2021).

WHEREFORE, the Parties request the Court to enter the Order Extending Expert Deadlines attached hereto, and for such other relief as the Court deems necessary.

Dated: January 4, 2021

Respectfully Submitted,

/s/ Thomas P. Schult

Thomas P. Schult MO #29986  
Jennifer Wieland MO #57271  
Berkowitz Oliver LLP  
2600 Grand Boulevard, Suite 1200  
Kansas City, Missouri 64108  
(816) 561-7007  
tschult@berkowitzoliver.com  
jwieland@berkowitzoliver.com

*Counsel for Defendant  
Dorel Juvenile Group, Inc.*

/s/ Melissa K. Donlon

Bradley D. Kuhlman MO #42596  
Melissa K. Donlon MO #71745  
Kuhlman & Lucas, LLC  
4700 Belleview Ave., Suite 300  
Kansas City, Missouri 64112  
(816) 799-0330  
chad@kuhlmanlucas.com  
melissa@kuhlmanlucas.com

*Counsel for Plaintiffs Lane Allmond and  
Misty Allmond*

### **CERTIFICATE OF SERVICE**

I certify that on this 4th day of January 2021, this Joint Motion for Order Extending Expert Deadlines was filed using the CM/ECF System, which sent notice to all counsel of record.

/s/ Thomas P. Schult

**Attorney for Defendant Dorel Juvenile  
Group, Inc.**